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DATE: February 21, 1995

TO: Carl Spreng, CDPHE
Arturo Duran, EPA

FROM: Peg Witherill pw

SUBJECT: Update on the status of the OU7 PAM

I thought it might be helpful if I gave you a draft summary of the status of the OU7 PAM prior to our meeting tomorrow. Since the agenda appears to be pretty full, you would have a chance to prepare any questions ahead of time.

After my first day as OU7 Project Manager, I was asked by EG&G to sign a memo that authorized them to proceed with the procurement of the Seep Collection and Treatment System. The cost estimate for constructing this system was approximately $520K. When I asked the question "Why are we doing this?", I received a variety of answers. I researched many of the project records and the following information summarizes the findings.

BACKGROUND:

The Department of Energy (DOE) agreed to do an IM/IRA for leachate collection according to the Statement of Resolution on the Pond Water Management IM/IRA signed by the Senior Executive Committee under the Interagency Agreement (IAG) on April 15, 1994.

The CDPHE, with EPA's concurrence, approved the document on December 8, 1994.

The CDPHE and EPA reiterate that actions proposed under PAMs are to be implemented within six months of the date when the parties agree that they are necessary and appropriate.

ISSUE:

The DOE would like to request that CDPHE and EPA review the following facts and associated data as related to the OU7 Seep Collection and Treatment System to determine when the proposed action is necessary and appropriate.

FACTS:

- A risk analysis was performed on the seep water using a trespasser scenario: a) drinking the seep water and b) swimming in the pond. Close scrutiny reveals that the seep water does not consistently contain detectable concentrations of many of the organic hazardous constituents from the wastes which caused the listing.

- Some of the organic hazardous constituents that were detected in the seep water were also found in quality control samples, suggesting laboratory contamination which compromises the validity of the data. This is particularly true of data collected prior to 1991, when strictly-enforced data quality controls were first applied to the water quality data collection program. Some detections of organic hazardous constituents appear valid but concentrations are below levels that could cause a health risk in excess of conservative screen levels.

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ADMIN RECORD

A-OU07-000484

- The existing East Landfill Pond which retains the seep water is not lined and therefore does not meet RCRA impoundment design standards. However, DOE believes that the situation involves an environmental media containing F039 and we should be able to apply the "contained-in" policy.

- The total cost of PAM development, implementation, and operation for two full years is $2,386,000 to $2,427,000.

PAM preparation and project management	FY 94/95 $229,000
System design and pre-procurement	FY 94/95 $188,000
Construction	FY 95 $520,000
Trucking/monitoring costs to B891	FY 96 $745,000 FY 97 $745,000

BENEFIT:

- CDPHE, EPA, and DOE can prove to the public that there is no immediate threat to human health and the environment during the next two years (during which alternatives for final closure are being assessed).

- CDPHE directed DOE to close the landfill pond concurrent with the landfill itself. (letter dated October 13, 1993). DOE concurs with this initial direction.

  "The agencies believe that simultaneous closure of the landfill and the landfill pond would be appealing from an engineering and economic perspective. In order to set a course of action for the landfill pond, a preliminary evaluation of risk for the water, sediments, and adjacent soils (including spray evaporation areas) should be performed. If the pond represents an unacceptable risk, joint closure would (not) be warranted."

- CDPHE, EPA, and DOE have shown a good faith effort to close the landfill by accelerating the final action by four years. This effort could be further accelerated if resources are appropriately applied by developing the Interim Remedial Action into a sound final remedy. This would result in an additional acceleration of three years.

- CDPHE, EPA, and DOE can show stakeholders the best utilization of taxpayer dollars.

COMPARATIVE EXAMPLE:

- The same approach has been taken with the risk assessment scenario for OU1 and OU2, which was accepted and approved by the CDPHE and EPA representatives.

CONCLUSION:

The risk related to the OU7 seep and adjacent pond does not support the need for an *immediate* removal action at OU7 but remediation should be addressed as part of the final closure.

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